

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 7:24-cv-00033-DC-DTG

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DEFENDANT’S MOTION TO DISMISS**

Plaintiff VirtaMove, Corp. (“Plaintiff”) respectfully moves for a two-week extension of time for Plaintiff to file its response to Defendant Google LLC’s (“Defendant”) Motion to Dismiss (Dkt. 21).

Plaintiff’s deadline to respond to the Motion is currently May 7, 2024 and, with this two-week extension, the deadline would be May 21, 2024. Defendant’s deadline to reply in support of the Motion is currently due on May 14, 2024 and, with the granting of this Motion, the deadline would be May 28, 2024. These extensions are not being sought for purposes of delay, but rather to ensure the parties and their counsel have adequate time to address the issues raised in Defendant’s Motion.

Counsel for the parties have conferred and all parties stipulate to this extension. Accordingly, Plaintiff requests that the Court grant the motion and enter the attached proposed Order.

Dated: April 24, 2024

Respectfully submitted,

By: /s/ Reza Mirzaie

Reza Mirzaie (CA SBN 246953)  
rmirzaie@raklaw.com  
Marc A. Fenster (CA SBN 181067)  
mfenster@raklaw.com  
Neil A. Rubin (CA SBN 250761)  
nrubin@raklaw.com  
James A. Milkey (CA SBN 281283)  
jmilkey@raklaw.com  
Amy E. Hayden (CA SBN 287026)  
ahayden@raklaw.com  
Jacob Buczeko (CA SBN 269408)  
jbuczeko@raklaw.com  
James Tsuei (CA SBN 285530)  
jtsuei@raklaw.com  
Christian W. Conkle (CA SBN 306374)  
cconkle@raklaw.com  
Jonathan Ma (CA SBN 312773)  
jma@raklaw.com  
Daniel B. Kolko (CA SBN 341680)  
dkolko@raklaw.com  
**RUSS AUGUST & KABAT**  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90025  
Telephone: (310) 826-7474

Qi (Peter) Tong (TX SBN 24119042)  
**RUSS AUGUST & KABAT**  
4925 Greenville Ave., Suite 200  
Dallas, TX 75206  
Telephone: (310) 826-7474

*Attorneys for Plaintiff VirtaMove, Corp.*

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2024, a true and correct copy of the foregoing document was electronically filed with the Court and served on all parties of record via the Court's CM/ECF system.

/s/ Reza Mirzaie

Reza Mirzaie

**CERTIFICATE OF CONFERENCE**

I certify that counsel for VirtaMove conferred with counsel for Google regarding the subject of this motion, and this motion is agreed.

/s/ Reza Mirzaie

Reza Mirzaie